Mbak™
ENERGY SOLUTIONS

Mr. Donald A. Lepp

Barrow & Grimm, P.C.

110 w. 7th Street, Suite 900

Tulsa, OK 74119

VIA FAX: +1 (918) 585 2444

May 24, 2026

Ref: MOTION FOR EXTENSION OF TIME TO ANSWER THE AMENDED COMPLAINT of 3/19/2026 CASE NR 26-cv-000091-SH

Dear Attorney Lepp,

Reference is made to the above mentioned amended complaint of 3/19/2026 Case Nr. 26-cv-000091- SH.

We request additional time to retain counsel for MBAK Energy Solutions Inc.

We thank you in advance for your consideration.

Sincerely,

MBAK Energy Solutions Inc

Nolin Han

CEO

Nolin.han@mbakcorp.com

Encl: Motion for Extention of Time dated May 25, 2026

UNITED STATED DISTRICT COURT

For the

Northern District of Oklahoma

(1) MIA OUTDOORS DISTRIBUTION)
SERVICES, LLC, an Oklahoma domestic)
limited liability company,d/b/a JIMMY's EV)
WORLD,)
(2) JIMMY LONG an individual: and.)
(3) TERRENCE ANTON, an individual,)
Plaintiffs,)

v. Case No. 26-cv-00091-SH

(1) MIA GLOBAL USA INC, a foreign business) Jury Trial: __Yes ___ No
Corporation;)
(2) MIA GLOBAL,INC., a foreign business corporation;)
(3) MBAK ENERGY SOLUTIONS INC.;)
(4) CHINA BAK BATTERY, INC.;)
(5) MICHELLE BOOS, an individual;)
(6) GABRIEL CARRELO, an individual;)
(7) RANDELL TORNO, an individual; and)
(8) NOLIN HAN, an individual.)
Defendants

DEFENDANT'S MOTION FOR EXTENSION OF TIME TO ANSWER THE AMENDED COMPLAINT of 3/19/2026 CASE NR 26-cv-000091-SH

1.Defendant MBAK Energy Solutions Inc, requests extension of time since the registered agent of the company in Wyoming only notified the Company management on **May 20, 2026.** It seems that the service of the summons went first to a satellite office of the registered agent.

2.Defendant MBAK Energy Solutions is interviewing various firms to retain counsel and requests the deadline to be extended to June 25, 2026

3. This is the first time that Defendant has asked an extension. We have not conferred with opponent's counsel

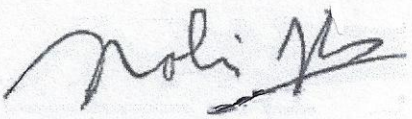
3.Defendant MBAK Energy Solutions faxed a request on May 25, 2026 to the Plaintiffs' attorney Donald A. Lepp OBA, Nr. 12260 from Barrow & Grimm, P.C. 110 W.7th Street, Suite 900, Tulsa, OK 74119. We have not heard back from Plaintiffs' attorney.

WHEREFORE, Defendant, MBAK respectfully request that the Court allot 30 days to retain counsel and no judgement be entered for Cause of Action 1-13 at this moment or a default judgement.

We agree to provide the Clerk's Office with any changes to my address where case-related papers may be served.

Date of signing: May 25, 2026_____

Signature of Defendant



Printed Name of Defendant

Nolin Han

CEO

MBAK Energy Solutions Inc.

Respectfully submitted

MBAK Energy Solutions
inc

Street Address : 4120 US HWY 421 N, Building 4, Wilmington, NC 28401

City and County. Wilmington

State and Zip Code NC, 28401

Telephone Number : +1 508 356 5433

E-mail Address: info@mbakcorp.com

CERTIFICATE OF SERVICE

I hereby certify that on this 25th Day of May 2026, I electronically transmitted the foregoing document to the court Clerk using the Email filing, which will transmit a Notice of Electronic Filing to the following ECF registrants:

Donald A. Lepp OBA, Nr. 12260

BARROW & GRIMM, P.C.

110 W. 7th Street, Suite 900

Tulsa, OK 74119

918 584 1600

918 585 2444 (Fax)

Attorney for Plaintiffs